

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-CR-20255-DIMITROULEAS

UNITED STATES OF AMERICA

v.

**PATRICK BOYD and,
CHARLES BOYD**

Defendants.

**UNITED STATES' UNOPPOSED MOTION TO FILE CERTAIN TRIAL
EXHIBITS UNDER SEAL AND TO EXEMPT CERTAIN
TRIAL EXHIBITS FROM ELECTRONIC FILING**

The United States of America, by and through undersigned counsel, files this unopposed motion seeking a Court order permitting the government to (a) file certain trial exhibits under seal and (b) exempt certain trial exhibits from electronic filing pursuant to Local Rule 5.3 and Rule 49.1 of the Federal Rules of Criminal Procedure.

The Government intends to electronically file the vast majority of its trial exhibits on the public docket, including redactions where necessary, but seeks to file the exhibits identified below under seal. These exhibits contain individuals' confidential, personally identifying information. Accordingly, the Government moves for an order authorizing the filing of these specific admitted trial exhibits under seal:

- GX 702 (JPMC x3729 bank records)
- GX 705 (JPMC x8933 bank records)
- GX 706 (JPMC x9826 bank records)
- GX 710 (Univest Bank x9807 bank records)
- GX 711 (Wells Fargo Mr. Unlimited LLC bank records)

Additionally, the Government moves for an order exempting the following exhibits from electronic filing, which consist of deposition video files, large Microsoft Excel spreadsheets, and native Cellebrite phone extractions containing various folders and attachments.

- 70
- 71
- 72
- 73
- 74
- 80
- 81
- 83
- 135A
- 136A
- 295A
- 303A
- 303B
- 305A
- 350A
- 371A
- 501
- 503
- 505
- 641
- 668

Respectfully submitted,

JASON A. REDING QUINOÑES
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA

Dated: November 6, 2025

By: /s/ Alexander Thor Pogozelski
Alexander Thor Pogozelski
Assistant United States Attorney
Florida Special Bar No. A5502549
99 Northeast 4th Street
Miami, FL 33132
Tel: (786) 649-5251
E-mail: Alexander.Pogozelski@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 6, 2025, a true and correct copy of the foregoing was filed and served on all counsel of record via the CM/ECF system.

/s/ Alexander Thor Pogozelski
Assistant United States Attorney